

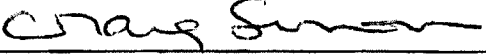
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U.S. DISTRICT COURT
EASTERN DIST. TENN.

____ DEPT. CLERK

EXHIBIT 2

| | | | | | |
|--|--|--|--|---|--|
| CLAIM FOR DAMAGE, INJURY, OR DEATH | | INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions. | | FORM APPROVED OMB NO. 1105-0008 | |
| 1. Submit to Appropriate Federal Agency: United States Department of the Interior National Park Service 1849 C. Street, N.W. Washington DC 20240 | | | 2. Name, address of claimant, and claimant's personal representative if any. <small>(See instructions on reverse). Number, Street, City, State and Zip code.</small> American Reliable Insurance Company [See Attached Exhibit "A" for Additional Carrier/Company names] c/o Berger Kahn, Craig S. Simon 1 Park Plaza, Ste. 340, Irvine, CA 92614 | | |
| 3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN | | 4. DATE OF BIRTH | 5. MARITAL STATUS | 6. DATE AND DAY OF ACCIDENT 11/23-29/2016 | |
| 7. TIME (A.M. OR P.M.) | | | | | |
| 8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). Claimants' damages are the direct and proximate result of the negligent acts or omissions by the U.S. Dept of the Interior and the National Park Service in connection with the Chimney Tops II Fire that started on November 23, 2016 in the Great Smoky Mountains National Park (GSMNP). [Continued in Attachment B, next page] | | | | | |
| 9. PROPERTY DAMAGE | | | | | |
| NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). See "C" attached list of claims paid to Claimant's insureds as a result of damage to real and personal property, and evacuation. BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. <small>(See instructions on reverse side).</small> See attached list of claims and addresses attached as "C". | | | | | |
| 10. PERSONAL INJURY/WRONGFUL DEATH | | | | | |
| STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. Claims include damage caused by evacuation, fire and smoke the property of Claimant's insureds, including damage to real and personal property, added living expenses, business property, and loss of income (including business and residential rental income). | | | | | |
| 11. WITNESSES | | | | | |
| NAME | | ADDRESS (Number, Street, City, State, and Zip Code) | | | |
| Greg Salansky, Fire Mgmt. Officer Greg Miller (Chief Miller) | | Employee, Dept. of Interior, National Park Service (address unknown) Gallinburn Fire Department Chief (address unknown) | | | |
| 12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars) | | | | | |
| 12a. PROPERTY DAMAGE 53,424,421 | | 12b. PERSONAL INJURY | | 12c. WRONGFUL DEATH | |
| | | | | 12d. TOTAL (Failure to specify may cause forfeiture of your rights). 53,424,421 | |
| I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM. | | | | | |
| 13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).  | | | 13b. PHONE NUMBER OF PERSON SIGNING FORM 949-474-1880 | | 14. DATE OF SIGNATURE 11/19/2018 |
| CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM <small>The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).</small> | | | CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS <small>Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)</small> | | |

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NSN 7540-00-634-4046

STANDARD FORM 95 (REV. 2/2007)
 PRESCRIBED BY DEPT. OF JUSTICE
 28 CFR 14.2

EXHIBIT 2

| INSURANCE COVERAGE | |
|---|--|
| In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property. | |
| 15. Do you carry accident insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. <input checked="" type="checkbox"/> No | |
| Claimant is an insurance carrier seeking recovery in subrogation for damages paid to its insureds. | |
| 16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? <input type="checkbox"/> Yes <input type="checkbox"/> No | 17. If deductible, state amount. |
| 18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts). | |
| 19. Do you carry public liability and property damage insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). <input type="checkbox"/> No | |
| INSTRUCTIONS | |
| <p>Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.</p> <p style="text-align: center;">Complete all items - Insert the word NONE where applicable.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY</p> <p>Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.</p> <p>If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.</p> <p>The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.</p> <p>If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.</p> </div> <div style="width: 48%;"> <p>DAMAGES IN A SUM CERTAIN FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN TWO YEARS AFTER THE CLAIM ACCRUES.</p> <p>The amount claimed should be substantiated by competent evidence as follows:</p> <p>(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.</p> <p>(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.</p> <p>(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.</p> <p>(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.</p> </div> </div> | |
| PRIVACY ACT NOTICE | |
| <p>This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.</p> <p>A. <i>Authority:</i> The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.</p> | <p>B. <i>Principal Purpose:</i> The information requested is to be used in evaluating claims.</p> <p>C. <i>Routine Use:</i> See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.</p> <p>D. <i>Effect of Failure to Respond:</i> Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."</p> |
| PAPERWORK REDUCTION ACT NOTICE | |
| <p>This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Tort Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.</p> | |

STANDARD FORM 95 REV. (2/2007) BACK

EXHIBIT 2

ATTACHMENT "A" TO FORM 95 CLAIM FORM:

Continued response to Question 2: Name and Address of Claimant:

List of American Reliable insurance carriers include, but are not limited to:

American Reliable Insurance Company
United National Insurance Company

ATTACHMENT "B" TO FORM 95 CLAIM FORM:

Continued response to Question 8: Basis of Claim:

Claimants allege that USA, the Department of the Interior and the National Park Service, by and through its employees and agents, failed to monitor the fire, and failed to initiate any direct-attack to suppress the fire despite predicted high winds. When high winds arose as predicted on 11/28/16, the fire escaped the Park and rapidly grew in size and strength, causing extensive damage to Claimants' insureds in nearby cities. Plaintiffs seek remedies for substantial property damages suffered by insureds and paid by Claimants under policies of insurance resulting from the negligent acts and/or omissions of employees or agents of the National Park Service and/or Department of the Interior – while acting within the course and scope of their employment or agency – in direct violation of mandated requirements and/or policies and in wanton neglect and disregard of public safety, including:

- the failure to monitor The Chimney Tops 2 Fire in the Great Smokey Mountain National Park;
- failure to adhere to mandatory command-structure requirements;
- failure to adhere to mandatory fire management policies and requirements;
- neglecting to perform requisite complexity analyses;
- negligently implementing a 410-acre containment box;
- negligently failing to adopt contingency plans in case The Chimney Tops 2 Fire escaped the containment box or the GSMNP;
- negligently disregarding fire-behavior modeling;
- negligently failing to utilize available air operations to suppress The Chimney Tops 2 Fire;

- negligently failing to implement a universal communications system to permit inter-agency communications, thus preventing many responders from effectively communicating with one another;
- negligently failing to utilize the Wildland Fire Decision Support System (“WFDSS”), which would have prompted (1) periodic assessments of the ongoing effectiveness and (2) re-evaluation of suppression-strategies; and
- negligently failing to provide timely and accurate notice and warning to Park neighbors, local government officials, local fire departments, local residents and visitors about the status of and imminent danger presented by The Chimney Top 2 Fire.

ATTACHMENT "C" TO FORM 95 CLAIM FORM:

Continued response to Question 10: List of Claims

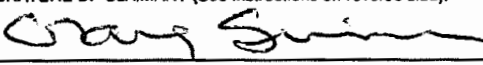
See attached List of Claims.

| Carrier | Claim Number | Loss Location Street | Loss Location City | Loss Location State | Loss Location Zip | Paid & Open Reserves Total Damages |
|---------|--------------|--------------------------|--------------------|---------------------|-------------------|------------------------------------|
| ARIC | R16188321 | 810 VALLEY VIEW LANE | GATLINBURG | TN | 37738 | \$ - |
| ARIC | R16188415 | 406 MAPLES RD | GATLINBURG | TN | 37738 | \$ - |
| ARIC | R16188862 | 1215 OAK PL | GATLINBURG | TN | 37738 | \$ - |
| ARIC | R16188587 | 617 BASKINS CREEK RD | GATLINBURG | TN | 37738 | \$ 100,690.00 |
| ARIC | R16188108 | 314 RACCOON RIDGE RD | GATLINBURG | TN | 37738 | \$ 466,078.65 |
| ARIC | R16188115 | 943 HIGH MOUNTAIN WAY | GATLINBURG | TN | 37738 | \$ 744.97 |
| ARIC | R16188135 | 646 CUB PATH WAY | GATLINBURG | TN | 37738 | \$ 3,585.09 |
| ARIC | R16188138 | 271 ROARING FORK RD | GATLINBURG | TN | 37738 | \$ 254,232.75 |
| ARIC | R16188196 | 705 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 363,685.56 |
| ARIC | R16188199 | 801 KINGS WAY UNIT 1 | GATLINBURG | TN | 37738 | \$ 33,348.69 |
| ARIC | R16188208 | 636 JESS FIELD RD | GATLINBURG | TN | 37738 | \$ 226,583.29 |
| ARIC | R16188212 | 505 BASKINS CREEK RD | GATLINBURG | TN | 37738 | \$ 159,488.49 |
| ARIC | R16188230 | 255 LAUREL OAKS WAY | GATLINBURG | TN | 37738 | \$ 407,798.68 |
| ARIC | R16188240 | 225 CHIMNEY TOPS WAY | GATLINBURG | TN | 37738 | \$ 164,391.76 |
| ARIC | R16188244 | 311 BEECH RIDGE LN | GATLINBURG | TN | 37738 | \$ 255,375.53 |
| ARIC | R16188262 | 158 ROARING FORK RD | GATLINBURG | TN | 37738 | \$ 30,777.93 |
| ARIC | R16188286 | 610 HILLBILLY HAVEN WAY | GATLINBURG | TN | 37738 | \$ 13,780.10 |
| ARIC | R16188293 | 823 KINGS WAY | GATLINBURG | TN | 37738 | \$ 220,172.10 |
| ARIC | R16188295 | 802 KINGS WAY | GATLINBURG | TN | 37738 | \$ 31,255.13 |
| ARIC | R16188297 | 1114 KINGS RIDGE RD E | GATLINBURG | TN | 37738 | \$ 333,068.45 |
| ARIC | R16188319 | 1048 LITTLE SMOKY RD | GATLINBURG | TN | 37738 | \$ 37,573.14 |
| ARIC | R16188331 | 120 BON AIR DR UNIT 1042 | GATLINBURG | TN | 37738 | \$ 3,654.11 |
| ARIC | R16188338 | 723 MOUNTAIN STREAM WAY | GATLINBURG | TN | 37738 | \$ 8,974.92 |
| ARIC | R16188353 | 832 RESORT WAY | GATLINBURG | TN | 37738 | \$ 56,990.24 |
| ARIC | R16188360 | 509 SMOKY VIEW CT | GATLINBURG | TN | 37738 | \$ 5,007.13 |
| ARIC | R16188364 | 724 HORNE BLOWE PIKE | GATLINBURG | TN | 37738 | \$ 8,216.84 |
| ARIC | R16188403 | 536 FOREST SPRINGS DR | GATLINBURG | TN | 37738 | \$ 11,420.00 |
| ARIC | R16188408 | 407 ABRAM FALLS WAY | GATLINBURG | TN | 37738 | \$ 135,922.13 |
| ARIC | R16188409 | 513 PARSONS BRANCH WAY | GATLINBURG | TN | 37738 | \$ 23,529.83 |
| ARIC | R16188410 | 815 EAGLE COVE WAY | GATLINBURG | TN | 37738 | \$ 22,365.46 |
| ARIC | R16188416 | 937 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 23,290.57 |
| ARIC | R16188422 | 837 PINEY BUTT LOOP | GATLINBURG | TN | 37738 | \$ 374,764.00 |
| ARIC | R16188427 | 130 BON AIR DR | GATLINBURG | TN | 37738 | \$ 4,430.75 |
| ARIC | R16188445 | 529 LAUREL AVE | GATLINBURG | TN | 37738 | \$ 4,128.83 |
| ARIC | R16188449 | 611 RED BUD LN | GATLINBURG | TN | 37738 | \$ 4,113.28 |
| ARIC | R16188450 | 619 RED BUD LN | GATLINBURG | TN | 37738 | \$ 4,128.83 |
| ARIC | R16188451 | 607 RED BUD LN | GATLINBURG | TN | 37738 | \$ 3,389.40 |
| ARIC | R16188452 | 615 RED BUD LN | GATLINBURG | TN | 37738 | \$ 4,113.28 |
| ARIC | R16188453 | 676 RED BUD LN | GATLINBURG | TN | 37738 | \$ 6,524.22 |
| ARIC | R16188454 | 527 LAUREL AVE | GATLINBURG | TN | 37738 | \$ 4,128.83 |
| ARIC | R16188456 | 523 LAUREL AVE | GATLINBURG | TN | 37738 | \$ 5,834.08 |
| ARIC | R16188488 | 542 EDGEWOOD DR | GATLINBURG | TN | 37738 | \$ 262,624.15 |
| ARIC | R16188490 | 965 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 275,832.79 |
| ARIC | R16188496 | 908 HIGH MTN WAY | GATLINBURG | TN | 37738 | \$ 2,730.00 |
| ARIC | R16188497 | 739 YONA TRAIL WAY | GATLINBURG | TN | 37738 | \$ 2,450.00 |
| ARIC | R16188519 | 1437 NORDIC DR | GATLINBURG | TN | 37738 | \$ 3,449.84 |
| ARIC | R16188526 | 147 ROARING FORK RD | GATLINBURG | TN | 37738 | \$ 13,103.76 |
| ARIC | R16188530 | 510 EDGEWOOD DR | GATLINBURG | TN | 37738 | \$ 230,363.82 |
| ARIC | R16188539 | 1701 SMOKY HILLS DR | GATLINBURG | TN | 37738 | \$ 5,389.48 |
| ARIC | R16188570 | 215 WOLISS LN UNIT 108 | GATLINBURG | TN | 37738 | \$ 4,751.83 |
| ARIC | R16188661 | 1827 SAINT MORITZ DR | GATLINBURG | TN | 37738 | \$ 1,134.82 |
| ARIC | R16188663 | 215 WOLISS LN UNIT 509 | GATLINBURG | TN | 37738 | \$ 12,475.15 |
| ARIC | R16188669 | 1038 LOWER ALPINE WAY | GATLINBURG | TN | 37738 | \$ 6,295.23 |
| ARIC | R16188693 | 1428 NARBON LN | GATLINBURG | TN | 37738 | \$ 292.80 |
| ARIC | R16188702 | 853 GREAT SMOKY WAY | GATLINBURG | TN | 37738 | \$ 3,892.00 |
| ARIC | R16188704 | 1027 CONDO DR | GATLINBURG | TN | 37738 | \$ 11,547.86 |
| ARIC | R16188740 | 325 N MOUNTAIN TRL | GATLINBURG | TN | 37738 | \$ 403,275.80 |
| ARIC | R16188742 | 1226 FOX RUN | GATLINBURG | TN | 37738 | \$ 13,993.02 |
| ARIC | R16188743 | 743 RIDGE RD | GATLINBURG | TN | 37738 | \$ 10,709.48 |
| ARIC | R16188748 | 932 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 7,740.40 |
| ARIC | R16188750 | 523 PATTERSON LN | GATLINBURG | TN | 37738 | \$ 2,327.27 |

| Carrier | Claim Number | Loss Location Street | Loss Location City | Loss Location State | Loss Location Zip | Paid & Open Reserves Total Damages |
|---------|--------------|---------------------------|--------------------|---------------------|-------------------|------------------------------------|
| ARIC | R16188751 | 531 PATTERSON LN | GATLINBURG | TN | 37738 | \$ 2,327.27 |
| ARIC | R16188752 | 527 PATTERSON LN | GATLINBURG | TN | 37738 | \$ 2,327.27 |
| ARIC | R16188759 | 621 DAVENPORT RD | GATLINBURG | TN | 37738 | \$ 14,231.66 |
| ARIC | R16188805 | 215 SKI MOUNTAIN RD # 205 | GATLINBURG | TN | 37738 | \$ 7,571.85 |
| ARIC | R16188817 | 806 OLD NEW GROUND RD | GATLINBURG | TN | 37738 | \$ 9,580.69 |
| ARIC | R16188865 | 718 VALLEY VIEW LANE | GATLINBURG | TN | 37738 | \$ 689.90 |
| ARIC | R16188887 | 618 CONDO VILLAS | GATLINBURG | TN | 37738 | \$ 4,664.08 |
| ARIC | R17189593 | 1624 W SKI VIEW DR | SEVIERVILLE | TN | 37876 | \$ 2,718.00 |
| ARIC | R16188109 | 591 FOREST SPRINGS DR | GATLINBURG | TN | 37738 | \$ 315,814.03 |
| ARIC | R16188116 | 219 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 1,704,876.00 |
| ARIC | R16188117 | 434 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 796,269.81 |
| ARIC | R16188118 | 553 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 828,015.00 |
| ARIC | R16188133 | 642 SUNSET LN | GATLINBURG | TN | 37738 | \$ 254,946.64 |
| ARIC | R16188149 | 727 HORNE BLOWE PIKE | GATLINBURG | TN | 37738 | \$ 400,178.97 |
| ARIC | R16188188 | 728 YONA TRAIL | GATLINBURG | TN | 37738 | \$ 10,010.93 |
| ARIC | R16188191 | 913 E END CT | GATLINBURG | TN | 37738 | \$ 587,444.93 |
| ARIC | R16188193 | 844 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 422,011.46 |
| ARIC | R16188194 | 908 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 363,672.72 |
| ARIC | R16188195 | 914 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 380,536.86 |
| ARIC | R16188197 | 662 KRISTIS PL | GATLINBURG | TN | 37738 | \$ 230,001.55 |
| ARIC | R16188209 | 850 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 582,475.33 |
| ARIC | R16188211 | 970 COTTAGE GARDENS WAY | GATLINBURG | TN | 37738 | \$ 445,693.51 |
| ARIC | R16188221 | 204 LAUREL OAKS WAY | GATLINBURG | TN | 37738 | \$ 300,000.98 |
| ARIC | R16188224 | 478 LOOP RD | GATLINBURG | TN | 37738 | \$ 33,000.11 |
| ARIC | R16188226 | 916 PINEY BUTT WAY | GATLINBURG | TN | 37738 | \$ 527,391.50 |
| ARIC | R16188231 | 332 SAVAGE GARDEN RD | GATLINBURG | TN | 37738 | \$ 45,660.43 |
| ARIC | R16188235 | 315 TOWER RD | GATLINBURG | TN | 37738 | \$ 619,157.04 |
| ARIC | R16188239 | 805 OAKLEY WAY | GATLINBURG | TN | 37738 | \$ 834,470.88 |
| ARIC | R16188245 | 830 CHALET VILLAGE BLVD | GATLINBURG | TN | 37738 | \$ 259,905.43 |
| ARIC | R16188250 | 468 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 207,040.76 |
| ARIC | R16188252 | 320 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 425,397.29 |
| ARIC | R16188254 | 290 RACCOON RIDGE RD | GATLINBURG | TN | 37738 | \$ 690,007.43 |
| ARIC | R16188259 | 658 KINGS WAY | GATLINBURG | TN | 37738 | \$ 540,080.95 |
| ARIC | R16188261 | 971 COTTAGE GARDENS WAY | GATLINBURG | TN | 37738 | \$ 293,638.62 |
| ARIC | R16188263 | 974 COTTAGE GARDENS WAY | GATLINBURG | TN | 37738 | \$ 374,648.12 |
| ARIC | R16188264 | 326 ROARING FORK RD # A | GATLINBURG | TN | 37738 | \$ 462,968.15 |
| ARIC | R16188266 | 722 VILLAGE LOOP RD | GATLINBURG | TN | 37738 | \$ 441,513.70 |
| ARIC | R16188267 | 305 ROARING FORK RD | GATLINBURG | TN | 37738 | \$ 374,349.77 |
| ARIC | R16188268 | 575 FOREST SPRINGS DR | GATLINBURG | TN | 37738 | \$ 586,317.44 |
| ARIC | R16188288 | 980 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 456,150.39 |
| ARIC | R16188292 | 1253 APPALACHIAN LN | GATLINBURG | TN | 37738 | \$ 547,000.31 |
| ARIC | R16188310 | 709 SPRING DR | GATLINBURG | TN | 37738 | \$ 285,915.07 |
| ARIC | R16188322 | 960 VILLAGE LOOP RD | GATLINBURG | TN | 37738 | \$ 466,829.06 |
| ARIC | R16188327 | 918 OLD NEW GROUND RD | GATLINBURG | TN | 37738 | \$ 325,909.93 |
| ARIC | R16188334 | 545 FOREST SPRINGS DRIVE | GATLINBURG | TN | 37738 | \$ 31,000.51 |
| ARIC | R16188335 | 819 N SKYLINE DR | GATLINBURG | TN | 37738 | \$ 275,924.52 |
| ARIC | R16188336 | 413 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 229,908.00 |
| ARIC | R16188337 | 223 CHIMNEY TOPS WAY | GATLINBURG | TN | 37738 | \$ 339,048.26 |
| ARIC | R16188339 | 463 SILVERBELL HEIGHTS LN | GATLINBURG | TN | 37738 | \$ 341,750.27 |
| ARIC | R16188340 | 1020 DEEP HOLLOW RD | GATLINBURG | TN | 37738 | \$ 245,349.20 |
| ARIC | R16188341 | 781 VILLAGE LOOP RD | GATLINBURG | TN | 37738 | \$ 441,250.65 |
| ARIC | R16188342 | 1050 VILLAGE LOOP RD | GATLINBURG | TN | 37738 | \$ 435,101.53 |
| ARIC | R16188344 | 855 CAMPBELL LEAD RD UNIT | GATLINBURG | TN | 37738 | \$ 50,642.69 |
| ARIC | R16188346 | 945 SOURWOOD DR | GATLINBURG | TN | 37738 | \$ 425,149.00 |
| ARIC | R16188351 | 746 TOPSIDE RD | GATLINBURG | TN | 37738 | \$ 312,987.96 |
| ARIC | R16188359 | 120 COOK DR | GATLINBURG | TN | 37738 | \$ 240,782.00 |
| ARIC | R16188361 | 814 CHALET VILLAGE BLVD | GATLINBURG | TN | 37738 | \$ 625,000.72 |
| ARIC | R16188362 | 843 SOURWOOD DR | GATLINBURG | TN | 37738 | \$ 416,606.57 |
| ARIC | R16188363 | 839 PARK DR | GATLINBURG | TN | 37738 | \$ 251,940.27 |
| ARIC | R16188365 | 870 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 264,640.73 |
| ARIC | R16188366 | 157 ROARING FORK RD | GATLINBURG | TN | 37738 | \$ 271,204.20 |

| Carrier | Claim Number | Loss Location Street | Loss Location City | Loss Location State | Loss Location Zip | Paid & Open Reserves Total Damages |
|---------|--------------|---------------------------|--------------------|---------------------|-------------------|------------------------------------|
| ARIC | R16188373 | 535 FOREST SPRINGS ROAD | GATLINBURG | TN | 37738 | \$ 395,437.80 |
| ARIC | R16188380 | 916 FARM WAGON RD | GATLINBURG | TN | 37738 | \$ 280,043.95 |
| ARIC | R16188382 | 703 SPRING DRIVE | GATLINBURG | TN | 37738 | \$ 651,092.60 |
| ARIC | R16188384 | 862 CLIFF BRANCH RD | GATLINBURG | TN | 37738 | \$ 419,558.42 |
| ARIC | R16188387 | 419 SILVERBELL HEIGHTS LN | GATLINBURG | TN | 37738 | \$ 569,737.86 |
| ARIC | R16188390 | 620 TOPSIDE RD | GATLINBURG | TN | 37738 | \$ 464,911.78 |
| ARIC | R16188392 | 859 SOURWOOD DR | GATLINBURG | TN | 37738 | \$ 328,546.56 |
| ARIC | R16188393 | 883 SOURWOOD DR | GATLINBURG | TN | 37738 | \$ 336,821.10 |
| ARIC | R16188394 | 908 N WOODLAND DR | GATLINBURG | TN | 37738 | \$ 278,332.08 |
| ARIC | R16188395 | 918 ELM RD | GATLINBURG | TN | 37738 | \$ 368,679.10 |
| ARIC | R16188396 | 355 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 462,894.25 |
| ARIC | R16188397 | 714 PINECREST CT | GATLINBURG | TN | 37738 | \$ 369,444.11 |
| ARIC | R16188398 | 848 CLABO LOOP | GATLINBURG | TN | 37738 | \$ 329,200.50 |
| ARIC | R16188399 | 841 PINEY BUTT LOOP | GATLINBURG | TN | 37738 | \$ 312,842.00 |
| ARIC | R16188400 | 110 BON AIR DR | GATLINBURG | TN | 37738 | \$ 106,406.00 |
| ARIC | R16188404 | 407 SMOKY VIEW RD | GATLINBURG | TN | 37738 | \$ 400,053.10 |
| ARIC | R16188405 | 635 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 632,400.91 |
| ARIC | R16188406 | 270 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 12,789.12 |
| ARIC | R16188407 | 270 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 14,794.13 |
| ARIC | R16188411 | 327 E HOLLY RIDGE RD | GATLINBURG | TN | 37738 | \$ 309,600.12 |
| ARIC | R16188413 | 1021 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 287,000.38 |
| ARIC | R16188417 | 757 WIDOWS KNOB RD | GATLINBURG | TN | 37738 | \$ 1,042,500.28 |
| ARIC | R16188418 | 827 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 302,505.62 |
| ARIC | R16188423 | 151 W HOLLY RIDGE RD | GATLINBURG | TN | 37738 | \$ 320,000.70 |
| ARIC | R16188429 | 979 COTTAGE GARDENS WAY | GATLINBURG | TN | 37738 | \$ 885,775.73 |
| ARIC | R16188432 | 740 WIDOWS KNOB RD | GATLINBURG | TN | 37738 | \$ 707,493.65 |
| ARIC | R16188433 | 748 WIDOWS KNOB RD | GATLINBURG | TN | 37738 | \$ 1,057,643.94 |
| ARIC | R16188434 | 426 CAMPBELL LEAD RD | GATLINBURG | TN | 37738 | \$ 648,592.06 |
| ARIC | R16188436 | 1124 LONGVIEW CT | GATLINBURG | TN | 37738 | \$ 323,879.46 |
| ARIC | R16188439 | 920 W CEDAR LN | GATLINBURG | TN | 37738 | \$ 375,406.46 |
| ARIC | R16188442 | 345 N MOUNTAIN TRL | GATLINBURG | TN | 37738 | \$ 300,500.12 |
| ARIC | R16188446 | 929 SMOKY COURT | GATLINBURG | TN | 37738 | \$ 485,100.12 |
| ARIC | R16188448 | 672 RED BUD LN | GATLINBURG | TN | 37738 | \$ 154,972.90 |
| ARIC | R16188457 | 856 N SKYLINE DR | GATLINBURG | TN | 37738 | \$ 1,068,325.94 |
| ARIC | R16188461 | 814 N WOODLAND DR | GATLINBURG | TN | 37738 | \$ 334,500.74 |
| ARIC | R16188462 | 911 ASPEN LN | GATLINBURG | TN | 37738 | \$ 187,681.16 |
| ARIC | R16188465 | 215 SKI MOUNTAIN RD UNIT | GATLINBURG | TN | 37738 | \$ 7,000.44 |
| ARIC | R16188469 | 1225 ANNES RD | GATLINBURG | TN | 37738 | \$ 166,213.04 |
| ARIC | R16188471 | 887 SOURWOOD DR | GATLINBURG | TN | 37738 | \$ 564,949.49 |
| ARIC | R16188473 | 855 CAMPBELL LEAD RD UNIT | GATLINBURG | TN | 37738 | \$ 41,700.28 |
| ARIC | R16188499 | 339 N MOUNTAIN TRL | GATLINBURG | TN | 37738 | \$ 253,665.94 |
| ARIC | R16188501 | 1230 HEMLOCK DR | GATLINBURG | TN | 37738 | \$ 860,000.40 |
| ARIC | R16188502 | 709 TOPSIDE RD | GATLINBURG | TN | 37738 | \$ 327,216.00 |
| ARIC | R16188506 | 125 DUDLEY CREEK RD #1 | GATLINBURG | TN | 37738 | \$ 584,612.30 |
| ARIC | R16188510 | 877 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 418,500.00 |
| ARIC | R16188511 | 649 PINECREST DR | GATLINBURG | TN | 37738 | \$ 305,501.04 |
| ARIC | R16188512 | 616 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 465,001.00 |
| ARIC | R16188513 | 121 VILLAGE DR UNIT 1 | GATLINBURG | TN | 37738 | \$ 94,003.01 |
| ARIC | R16188517 | 1037 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 426,600.76 |
| ARIC | R16188521 | 986 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 857,500.00 |
| ARIC | R16188522 | 1024 TWIN OAKS RD | GATLINBURG | TN | 37738 | \$ 105,600.00 |
| ARIC | R16188523 | 925 CROOKED RIDGE RD | GATLINBURG | TN | 37738 | \$ 213,730.00 |
| ARIC | R16188525 | 326 RACCOON RIDGE RD | GATLINBURG | TN | 37738 | \$ 362,694.05 |
| ARIC | R16188528 | 969 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 323,081.43 |
| ARIC | R16188531 | 1128 LONGVIEW CT | GATLINBURG | TN | 37738 | \$ 373,335.97 |
| ARIC | R16188538 | 844 N SKYLINE DR | GATLINBURG | TN | 37738 | \$ 330,000.64 |
| ARIC | R16188586 | 403 BASKINS CREEK RD UNIT | GATLINBURG | TN | 37738 | \$ 39,000.27 |
| ARIC | R16188592 | 403 BASKINS CREEK RD #50 | GATLINBURG | TN | 37738 | \$ 40,000.00 |
| ARIC | R16188593 | 1013 E FOOTHILLS DR | GATLINBURG | TN | 37738 | \$ 212,971.38 |
| ARIC | R16188640 | 822 BEANSTALK RD | GATLINBURG | TN | 37738 | \$ 35,000.00 |
| ARIC | R16188658 | 860 N SKYLINE DR | GATLINBURG | TN | 37738 | \$ 418,253.70 |

| Carrier | Claim Number | Loss Location Street | Loss Location City | Loss Location State | Loss Location Zip | Paid & Open Reserves Total Damages |
|---------|--------------|--------------------------|--------------------|---------------------|-------------------|------------------------------------|
| ARIC | R16188660 | 1152 VILLA OVERLOOK WAY | GATLINBURG | TN | 37738 | \$ 89,139.08 |
| ARIC | R16188662 | 703 SHORT RIDGE CT | GATLINBURG | TN | 37738 | \$ 27,448.08 |
| ARIC | R16188674 | 741 CHESTNUT DR | GATLINBURG | TN | 37738 | \$ 232,500.12 |
| ARIC | R16188675 | 1009 ELM RD | GATLINBURG | TN | 37738 | \$ 209,865.32 |
| ARIC | R16188676 | 1030 ELM RD | GATLINBURG | TN | 37738 | \$ 209,865.20 |
| ARIC | R16188677 | 1013 ELM RD | GATLINBURG | TN | 37738 | \$ 209,865.00 |
| ARIC | R16188681 | 1243 ANNES RD | GATLINBURG | TN | 37738 | \$ 25,000.46 |
| ARIC | R16188701 | 462 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 317,770.75 |
| ARIC | R16188703 | 625 PINECREST DR | GATLINBURG | TN | 37738 | \$ 214,925.22 |
| ARIC | R16188844 | 306 BASKINS CREEK RD #11 | GATLINBURG | TN | 37738 | \$ 4,000.23 |
| ARIC | R16188852 | 1013 WILEY OAKLEY DR | GATLINBURG | TN | 37738 | \$ 278,211.12 |
| ARIC | R17189572 | 403 BASKINS CREEK RD #20 | GATLINBURG | TN | 37738 | \$ 12,500.00 |
| ARIC | R17189621 | 685 RIVER RD UNIT 414 | GATLINBURG | TN | 37738 | \$ 2,500.00 |
| ARIC | R17190135 | 669 KINGS WAY | GATLINBURG | TN | 37738 | \$ 97,940.00 |
| ARIC | R16188192 | 655 GATLINBURG FALLS WAY | GATLINBURG | TN | 37738 | \$ 610,334.71 |
| ARIC | R16188906 | 4190 DELLINGER HOLLOW RD | PIGEON FORGE | TN | 37863 | \$ 7,500.00 |
| ARIC | R16188236 | 609 SUNSET LN | GATLINBURG | TN | 37738 | \$ 67,247.31 |
| ARIC | R16188251 | 517 EDGEWOOD DR | GATLINBURG | TN | 37738 | \$ 406,068.61 |
| ARIC | R16188294 | 800 KINGS WAY | GATLINBURG | TN | 37738 | \$ 296,509.35 |
| | | | | | | \$ 53,424,421.89 |

| | | | | | |
|--|--|--|---|--|--|
| CLAIM FOR DAMAGE, INJURY, OR DEATH | | INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions. | | FORM APPROVED OMB NO. 1105-0008 | |
| 1. Submit to Appropriate Federal Agency: United States Department of the Interior National Park Service 1849 C. Street, N.W. Washington DC 20240 | | | 2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. Assurant Group of Carriers See Attached Exhibit A for Full List of Carriers c/o Berger Kahn, Craig S. Simon 1 Park Plaza, Ste. 340, Irvine, CA 92614 | | |
| 3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN | | 4. DATE OF BIRTH | 5. MARITAL STATUS | 6. DATE AND DAY OF ACCIDENT 11/23-29/2016 | |
| 7. TIME (A.M. OR P.M.) | | | | | |
| 8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). Claimants' damages are the direct and proximate result of the negligent acts or omissions by the U.S. Dept of the Interior and the National Park Service in connection with the Chimney Tops II Fire that started on November 23, 2016 in the Great Smoky Mountains National Park (GSMNP). [Continued in Attachment B, next page] | | | | | |
| 9. PROPERTY DAMAGE | | | | | |
| NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). See "C" attached list of claims paid to Claimant's insureds as a result of damage to real and personal property, and evacuation. | | | | | |
| BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side). See attached list of claims and addresses attached as "C". | | | | | |
| 10. PERSONAL INJURY/WRONGFUL DEATH | | | | | |
| STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. Claims include damage caused by evacuation, fire and smoke the property of Claimant's insureds, including damage to real and personal property, added living expenses, business property, and loss of income (including business and residential rental income). | | | | | |
| 11. WITNESSES | | | | | |
| NAME | | ADDRESS (Number, Street, City, State, and Zip Code) | | | |
| Greg Salansky, Fire Mgmt. Officer Greg Miller (Chief Miller) | | Employee, Dept. of Interior, National Park Service (address unknown) Gatlinburn Fire Department Chief (address unknown) | | | |
| 12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars) | | | | | |
| 12a. PROPERTY DAMAGE 1,212,666 | | 12b. PERSONAL INJURY | | 12c. WRONGFUL DEATH | |
| | | | | 12d. TOTAL (Failure to specify may cause forfeiture of your rights). 1,212,666 | |
| I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM. | | | | | |
| 13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).  | | | 13b. PHONE NUMBER OF PERSON SIGNING FORM 949-474-1880 | | 14. DATE OF SIGNATURE 11/19/2018 |
| CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729). | | | CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.) | | |

| INSURANCE COVERAGE | |
|---|--|
| In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property. | |
| 15. Do you carry accident insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. <input checked="" type="checkbox"/> No | |
| Claimant is an insurance carrier seeking recovery in subrogation for damages paid to its insureds. | |
| 16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? <input type="checkbox"/> Yes <input type="checkbox"/> No | 17. If deductible, state amount. |
| 18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts). | |
| 19. Do you carry public liability and property damage insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). <input type="checkbox"/> No | |
| INSTRUCTIONS | |
| <p>Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.</p> <p style="text-align: center;">Complete all items - Insert the word NONE where applicable.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY</p> <p>Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.</p> <p>If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.</p> <p>The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.</p> <p>If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.</p> </div> <div style="width: 48%;"> <p>DAMAGES IN A SUM CERTAIN FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN TWO YEARS AFTER THE CLAIM ACCRUES.</p> <p>The amount claimed should be substantiated by competent evidence as follows:</p> <p>(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.</p> <p>(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.</p> <p>(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.</p> <p>(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.</p> </div> </div> | |
| PRIVACY ACT NOTICE | |
| <p>This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.</p> <p>A. <i>Authority:</i> The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.</p> | <p>B. <i>Principal Purpose:</i> The information requested is to be used in evaluating claims.</p> <p>C. <i>Routine Use:</i> See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.</p> <p>D. <i>Effect of Failure to Respond:</i> Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."</p> |
| PAPERWORK REDUCTION ACT NOTICE | |
| <p>This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Tort Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.</p> | |

STANDARD FORM 95 REV. (2/2007) BACK

EXHIBIT 2

ATTACHMENT "A" TO FORM 95 CLAIM FORM:

Continued response to Question 2: Name and Address of Claimant:

List of Assurant insurance carriers include, but are not limited to:

VOYAGER INDEMNITY INSURANCE CO
STANDARD GUARANTY INSURANCE CO
AMERICAN SECURITY INSURANCE CO
AMERICAN BANKERS INSURANCE COMPANY

ATTACHMENT "B" TO FORM 95 CLAIM FORM:

Continued response to Question 8: Basis of Claim:


Claimants allege that USA, the Department of the Interior and the National Park Service, by and through its employees and agents, failed to monitor the fire, and failed to initiate any direct-attack to suppress the fire despite predicted high winds. When high winds arose as predicted on 11/28/16, the fire escaped the Park and rapidly grew in size and strength, causing extensive damage to Claimants' insureds in nearby cities. Plaintiffs seek remedies for substantial property damages suffered by insureds and paid by Claimants under policies of insurance resulting from the negligent acts and/or omissions of employees or agents of the National Park Service and/or Department of the Interior – while acting within the course and scope of their employment or agency – in direct violation of mandated requirements and/or policies and in wanton neglect and disregard of public safety, including:

- the failure to monitor The Chimney Tops 2 Fire in the Great Smokey Mountain National Park;
- failure to adhere to mandatory command-structure requirements;
- failure to adhere to mandatory fire management policies and requirements;
- neglecting to perform requisite complexity analyses;
- negligently implementing a 410-acre containment box;
- negligently failing to adopt contingency plans in case The Chimney Tops 2 Fire escaped the containment box or the GSMNP;
- negligently disregarding fire-behavior modeling;
- negligently failing to utilize available air operations to suppress The Chimney Tops 2 Fire;
- negligently failing to implement a universal communications system to permit inter-agency communications, thus preventing many responders from effectively communicating with one another;
- negligently failing to utilize the Wildland Fire Decision Support System ("WFDSS"), which would have prompted (1) periodic assessments of the ongoing effectiveness and (2) re-evaluation of suppression-strategies; and

- negligently failing to provide timely and accurate notice and warning to Park neighbors, local government officials, local fire departments, local residents and visitors about the status of and imminent danger presented by The Chimney Top 2 Fire.

Assurant Entities: VOYAGER INDEMNITY INSURANCE CO; STANDARD GUARANTY INSURANCE CO; AMERICAN SECURITY INSURANCE CO; AMERICAN BANKERS INSURANCE COMPANY
List of Claims - Chimney Tops II Fire TN

| Carrier | Claim Number | Property Address | City | State | Zip | PAID & RESERVES |
|---------|--------------|------------------------------|-------------|-------|-------|-----------------|
| ABIC | AVP226562408 | 611 PARKWAY STE F13 | GATLINBURG | TN | 37738 | \$ 45,000.00 |
| ABIC | AVP234178606 | 438 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 16,000.00 |
| SG | 00102107332 | 122 WATER TOWER RD | GATLINBURG | TN | 37738 | \$ 110,000.00 |
| ABIC | 00102108273 | 1519 GARRETT LN | GATLINBURG | TN | 37738 | \$ 5,353.23 |
| SG | 00102108326 | 1509 ZURICH RD | GATLINBURG | TN | 37738 | \$ 6,198.25 |
| ABIC | 00102108451 | 328 OWNBY ST | GATLINBURG | TN | 37738 | \$ - |
| ABIC | 00102108464 | 238 CHURCH ST | GATLINBURG | TN | 37738 | \$ 1,600.00 |
| SG | 00102109080 | 745 ELLIS OGLE RD | GATLINBURG | TN | 37738 | \$ 122,560.00 |
| ABIC | 00102115711 | 1402 UPPER MIDDLE CREEK RD | SEVIERVILLE | TN | 37876 | \$ 1,600.00 |
| ABIC | 00102112170 | 1010 BRIEN CIR | GATLINBURG | TN | 37738 | \$ 1,600.00 |
| ABIC | 00102113296 | 961 CAMPBELL LEAD RD | GATLINBURG | TN | 37738 | \$ 4,000.00 |
| ABIC | 00102110781 | 210 ROARING FORK EXT STE 707 | GATLINBURG | TN | 37738 | \$ 2,715.22 |
| SG | 00200856257 | 1351 SKI VIEW DR | GATLINBURG | TN | 37738 | \$ - |
| ASIC | 00200856312 | 1010 BRIEN CIR | GATLINBURG | TN | 37738 | \$ 231,276.00 |
| SG | 00200857309 | 241 GREYSTONE HEIGHTS RD | GATLINBURG | TN | 37738 | \$ 664,764.00 |
| | | Total | | | | \$ 1,212,666.70 |

| | | | | | |
|--|-----------------------------|--|---|--|--|
| CLAIM FOR DAMAGE, INJURY, OR DEATH | | INSTRUCTIONS: Please read carefully the Instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions. | | FORM APPROVED OMB NO. 1105-0008 | |
| 1. Submit to Appropriate Federal Agency: United States Department of the Interior National Park Service 1849 C. Street, N.W. Washington DC 20240 | | | 2. Name, address of claimant, and claimant's personal representative if any. <small>(See Instructions on reverse). Number, Street, City, State and Zip code.</small> Farmers Insurance Exchange [See Attached Exhibit "A" for Additional Carrier/Company names] c/o Berger Kahn, Craig S. Simon 1 Park Plaza, Ste. 340, Irvine, CA 92614 | | |
| 3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN | 4. DATE OF BIRTH | 5. MARITAL STATUS | 6. DATE AND DAY OF ACCIDENT 11/23-29/2016 | 7. TIME (A.M. OR P.M.) | |
| 8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). Claimants' damages are the direct and proximate result of the negligent acts or omissions by the U.S. Dept of the Interior and the National Park Service in connection with the Chimney Tops II Fire that started on November 23, 2016 in the Great Smoky Mountains National Park (GSMNP). [Continued in Attachment B, next page] | | | | | |
| 9. PROPERTY DAMAGE | | | | | |
| NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). See "C" attached list of claims paid to Claimant's insureds as a result of damage to real and personal property, and evacuation. BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. <small>(See Instructions on reverse side).</small> See attached list of claims and addresses attached as "C". | | | | | |
| 10. PERSONAL INJURY/WRONGFUL DEATH | | | | | |
| STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. Claims include damage caused by evacuation, fire and smoke the property of Claimant's insureds, including damage to real and personal property, added living expenses, business property, and loss of income (including business and residential rental income). | | | | | |
| 11. WITNESSES | | | | | |
| NAME | | ADDRESS (Number, Street, City, State, and Zip Code) | | | |
| Greg Salansky, Fire Mgmt. Officer Greg Miller (Chief Miller) | | Employee, Dept. of Interior, National Park Service (address unknown) Gallinburn Fire Department Chief (address unknown) | | | |
| 12. (See Instructions on reverse). AMOUNT OF CLAIM (In dollars) | | | | | |
| 12a. PROPERTY DAMAGE 72,121,452 | 12b. PERSONAL INJURY | 12c. WRONGFUL DEATH | 12d. TOTAL (Failure to specify may cause forfeiture of your rights). 72,121,452 | | |
| I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM. | | | | | |
| 13a. SIGNATURE OF CLAIMANT (See instructions on reverse side):  | | | 13b. PHONE NUMBER OF PERSON SIGNING FORM 949-474-1880 | 14. DATE OF SIGNATURE 11/19/2018 | |
| CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM <small>The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).</small> | | | CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS <small>Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)</small> | | |

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STANDARD FORM 95 (REV. 2/2007)
 PRESCRIBED BY DEPT. OF JUSTICE
 28 CFR 14.2

EXHIBIT 2

| INSURANCE COVERAGE | |
|---|--|
| In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property. | |
| 15. Do you carry accident insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. <input checked="" type="checkbox"/> No | |
| Claimant is an insurance carrier seeking recovery in subrogation for damages paid to its insureds. | |
| 16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? <input type="checkbox"/> Yes <input type="checkbox"/> No | 17. If deductible, state amount. |
| 18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts). | |
| 19. Do you carry public liability and property damage insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). <input type="checkbox"/> No | |
| INSTRUCTIONS | |
| <p>Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.</p> <p style="text-align: center;">Complete all items - Insert the word NONE where applicable.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY</p> <p>Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.</p> <p>If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.</p> <p>The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.</p> <p>If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.</p> </div> <div style="width: 48%;"> <p>DAMAGES IN A <u>SUM CERTAIN</u> FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN <u>TWO YEARS</u> AFTER THE CLAIM ACCRUES.</p> <p>The amount claimed should be substantiated by competent evidence as follows:</p> <p>(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.</p> <p>(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.</p> <p>(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.</p> <p>(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.</p> </div> </div> | |
| PRIVACY ACT NOTICE | |
| <p>This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552(a)(3), and concerns the information requested in the letter to which this Notice is attached.</p> <p>A. <i>Authority:</i> The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.</p> | <p>B. <i>Principal Purpose:</i> The information requested is to be used in evaluating claims.</p> <p>C. <i>Routine Use:</i> See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.</p> <p>D. <i>Effect of Failure to Respond:</i> Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."</p> |
| PAPERWORK REDUCTION ACT NOTICE | |
| <p>This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to those addresses.</p> | |

STANDARD FORM 95 REV. (2/2007) BACK

EXHIBIT 2

ATTACHMENT "A" TO FORM 95 CLAIM FORM:

Continued response to Question 2: Name and Address of Claimant:

List of Farmers insurance carriers include, but are not limited to:

Farmers Insurance Exchange
Fire Insurance Exchange
FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN
FOREMOST PROPERTY AND CASUALTY INSURANCE COMPANY
FOREMOST SIGNATURE INSURANCE COMPANY
Illinois Farmers Insurance Company
Mid-Century Insurance Company
Truck Insurance Exchange

ATTACHMENT "B" TO FORM 95 CLAIM FORM:

Continued response to Question 8: Basis of Claim:

Claimants allege that USA, the Department of the Interior and the National Park Service, by and through its employees and agents, failed to monitor the fire, and failed to initiate any direct-attack to suppress the fire despite predicted high winds. When high winds arose as predicted on 11/28/16, the fire escaped the Park and rapidly grew in size and strength, causing extensive damage to Claimants' insureds in nearby cities. Plaintiffs seek remedies for substantial property damages suffered by insureds and paid by Claimants under policies of insurance resulting from the negligent acts and/or omissions of employees or agents of the National Park Service and/or Department of the Interior – while acting within the course and scope of their employment or agency – in direct violation of mandated requirements and/or policies and in wanton neglect and disregard of public safety, including:

- the failure to monitor The Chimney Tops 2 Fire in the Great Smokey Mountain National Park;
- failure to adhere to mandatory command-structure requirements;
- failure to adhere to mandatory fire management policies and requirements;
- neglecting to perform requisite complexity analyses;
- negligently implementing a 410-acre containment box;
- negligently failing to adopt contingency plans in case The Chimney Tops 2 Fire escaped the containment box or the GSMNP;
- negligently disregarding fire-behavior modeling;
- negligently failing to utilize available air operations to suppress The Chimney Tops 2 Fire;
- negligently failing to implement a universal communications system to permit inter-agency communications, thus preventing many responders from effectively communicating with one another;
- negligently failing to utilize the Wildland Fire Decision Support System ("WFDSS"), which would have prompted (1) periodic assessments of the ongoing effectiveness and (2) re-evaluation of suppression-strategies; and

- negligently failing to provide timely and accurate notice and warning to Park neighbors, local government officials, local fire departments, local residents and visitors about the status of and imminent danger presented by The Chimney Top 2 Fire.

ATTACHMENT "C" TO FORM 95 CLAIM FORM:

Continued response to Question 10: List of Claims

See attached List of Claims.

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claims Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--|---------------|--------------------|-------------------------------------|--------------------|-----------------|
| Farmers Insurance Exchange | 3007552957 | SAM | 407 W KINGSRIDGE LN | GATLINBURG | \$ 256,600.00 |
| Farmers Insurance Exchange | 3007561378 | BUSINESS | 212 PINNACLE DRIVE W | GATLINBURG | \$ 506,200.00 |
| Farmers Insurance Exchange | 3007561379 | BUSINESS | 231 LAUREL OAKS WAY | GATLINBURG | \$ 475,700.00 |
| Farmers Insurance Exchange | 3007562073 | BUSINESS | 2223 JARED RD | GATLINBURG | \$ - |
| Farmers Insurance Exchange | 3007568659 | BUSINESS | 503 CHEROKEE ORCHARD RD | GATLINBURG | \$ 292,350.18 |
| Farmers Insurance Exchange | 3007569874 | BUSINESS | 713 PINECREST Ct | GATLINBURG | \$ 523,098.00 |
| Farmers Insurance Exchange | 3007570334 | MARK | 225 SILVERBELL LN | GATLINBURG | \$ 414,764.12 |
| Farmers Insurance Exchange | 3007570764 | BUSINESS | 604 KINGS WAY | GATLINBURG | \$ 761,453.00 |
| Farmers Insurance Exchange | 3007575883 | BUSINESS | 361 WILEY OAKLEY DRIVE | GATLINBURG | \$ 541,476.00 |
| Farmers Insurance Exchange | 3007577307 | HILLARY | 312 CHURCH ST | GATLINBURG | \$ 3,762.09 |
| Farmers Insurance Exchange | 3007577678 | BUSINESS | 1143 UPPER ALPINE WAY | GATLINBURG | \$ - |
| Farmers Insurance Exchange | 3007586218 | BUSINESS | 1069 DEEP HOLLOW RD | GATLINBURG | \$ 443,963.00 |
| Farmers Insurance Exchange | 3007589148 | JACQUELINE | 225 CHURCH ST | GATLINBURG | \$ 268,314.12 |
| Farmers Insurance Exchange | 3007589768 | DIANE | 827 LEISURE LN | GATLINBURG | \$ 566,694.00 |
| Farmers Insurance Exchange | 3007590565 | BUSINESS | 236 STONE FENCE LN | GATLINBURG | \$ 908,670.00 |
| Farmers Insurance Exchange | 3007595120 | BUSINESS | 213 WEST PINNACLE DRIVE | GATLINBURG | \$ 31,537.16 |
| Farmers Insurance Exchange | 3007598542 | BUSINESS | 809 SKI VIEW LN | GATLINBURG | \$ 8,594.75 |
| Farmers Insurance Exchange | 3007606284 | PHILLIP | 1115 LONGVIEW CT | GATLINBURG | \$ 198,144.05 |
| Farmers Insurance Exchange | 3007635016 | TAWANA | 915 wegate resort rd | gatlinburg | \$ 6,700.00 |
| Farmers Insurance Exchange | 3007650995 | BUSINESS | 648 PARK VISTA WAY | GATLINBURG | \$ 2,692.04 |
| Farmers Insurance Exchange | 3007667718 | BUSINESS | 1256 BEAR CUB WAY | GATLINBURG | \$ 4,335.00 |
| Farmers Insurance Exchange | 5001782195 | DAVID | 841 Chewase Dr | Gatlinburg | \$ 580.37 |
| Farmers Insurance Exchange | 5001813287 | ANTONIO | 246 Stone Fence Ln | Gatlinburg | \$ 565,820.00 |
| Farmers Insurance Exchange | 3007554197 | BUSINESS | 413 SWAYING PINES DR | SEVIERVILLE | \$ 375,500.00 |
| Farmers Insurance Exchange | 3007561116 | BUSINESS | 1223 SKIVIEW LANE | SEVIERVILLE | \$ 6,457.23 |
| Farmers Insurance Exchange | 3007584888 | | 565 FOREST SPRINGS DR | GATLINBURG | \$ 696,914.00 |
| Fire Insurance Exchange | 3007570394 | CHARLES | 915 Westgate Resorts Rd Unit 507-15 | Gatlinburg | \$ 176.68 |
| FOREMOST | 3007564869 | LARRY | 815 kingsway | gatlinburg | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007551919 | WILLIAM | LT634 PINECREST DR | GATLINBURG | \$ 187,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552048 | MORSE | 304 BROWN WREN WAY | GATLINBURG | \$ 1,871.86 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552350 | TAMARA | 613 SUNSET LN | GATLINBURG | \$ 257,264.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552398 | MARK | 604 BASKINS CREEK RD | GATLINBURG | \$ 5,070.66 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552435 | DENNIS | 710 DAVENPORT RD | GATLINBURG | \$ 151,885.47 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552629 | GREG | 739 POPLAR FALLS WAY | GATLINBURG | \$ 214.09 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552641 | GREG | 933 HIGH MOUNTAIN WAY | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007552643 | GREG | 1154 SKI VIEW DR | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007554502 | CHARLES | 2308 SMOKY MOUNTAIN CT | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007556152 | KENNETH | LTS21 WILEY OAKLEY DR | GATLINBURG | \$ 240,120.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007556727 | JOHN | 713 VALLEY VIEW LN | GATLINBURG | \$ 164,713.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007556889 | JOHN | 717 VALLEY VIEW LANE | GATLINBURG | \$ 157,900.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007556970 | MITEL | 419 RED HAWK WAY | GATLINBURG | \$ 500,900.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007557200 | BENNY JOE | 786 MOUNTAIN STREAM WAY | GATLINBURG | \$ 311,400.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007557756 | BUSINESS | 915 WOOD SMOKE WAY | GATLINBURG | \$ 2,061.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007557951 | JARROD | 533 WILEY OAKLEY DR | GATLINBURG | \$ 334,791.80 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007558570 | BUSINESS | 789 MOUNTAIN STREAM WAY | GATLINBURG | \$ 1,201,375.90 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007560143 | ASOK | 645 WILEY OAKLEY DR | GATLINBURG | \$ 25,637.21 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007560324 | GERALD THOMAS CHAS | 780 MOUNTAIN STREAM WAY | GATLINBURG | \$ 418,293.21 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007560742 | BRIAN | 911 SMOKY CT | GATLINBURG | \$ 199,709.86 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007560957 | ANN | 436 GREYSTONE HEIGHTS RD | GATLINBURG | \$ 333,316.38 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007560968 | BUSINESS | 778 MOUNTAIN STREAM WAY | GATLINBURG | \$ 727,979.98 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561162 | BUSINESS | 666 GATLINBURG FALLS WAY | GATLINBURG | \$ 7,970.19 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561276 | KRISTINA | 639 KRISTIS PL | GATLINBURG | \$ 212,898.73 |

EXHIBIT 2

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--|--------------|----------------------|-------------------------|--------------------|-----------------|
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561289 | SUSAN | 840 SOURWOOD DR | GATLINBURG | \$ 252,500.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561385 | FRANCIS | 822 EAGLE COVE WAY | GATLINBURG | \$ 2,343.57 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561388 | MICHAEL | 810 KINGS WAY | GATLINBURG | \$ 294,400.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561411 | RETT | 834 HIGHLAND RD | GATLINBURG | \$ 323,812.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561538 | BUSINESS | 787 MOUNTAIN STREAM WAY | GATLINBURG | \$ 1,115,113.85 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561593 | BUSINESS | 836 RESORT WAY | GATLINBURG | \$ 312,337.68 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561595 | BUSINESS | 844 RESORT WAY | GATLINBURG | \$ 1,080,960.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561600 | BUSINESS | 848 RESORT WAY | GATLINBURG | \$ 647,012.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561608 | BUSINESS | 860 RESORT WAY | GATLINBURG | \$ 312,719.94 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007561739 | BUSINESS | 890 sourwood dr | gatlinburg | \$ 622,750.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007562070 | MICHAEL | 716 DAVENPORT RD | GATLINBURG | \$ 197,336.80 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007562204 | J.R. AND VALERIE | 617 TIMBER RIDGE RD | GATLINBURG | \$ 66,150.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007563228 | KIRTI | 264 LAUREL OAKS WAY | GATLINBURG | \$ 489,290.88 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007563340 | CHRISTOPHER | 622 JESS FIELD RD | GATLINBURG | \$ 382,179.48 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007563451 | BUSINESS | 116 ROARING FORK RD | GATLINBURG | \$ 243,152.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564013 | PAUL AND CHARLENE | 228 LAUREL OAKS WAY | GATLINBURG | \$ 574,332.55 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564157 | DEOLINDA | 232 OGLEWOOD LN | GATLINBURG | \$ 243,106.90 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564177 | BROOKE | 1114 AUSTIN DR | GATLINBURG | \$ 267,301.84 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564462 | CHARLES | 667 RED BUD LN | GATLINBURG | \$ 250,210.72 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564560 | EMMA L | LT933 EAST FOOTHILLS DR | GATLINBURG | \$ 296,906.57 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007564566 | BUSINESS | 840 RESORT WAY | GATLINBURG | \$ 1,199,192.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007565902 | BUSINESS | 820 VILLAGE PL | GATLINBURG | \$ 647,301.11 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007565974 | PAUL DEARING AND AN | 804 CRESTWOOD LN | GATLINBURG | \$ 231,893.92 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007565996 | JEFFREY | 923 WILEY OAKLEY DR | GATLINBURG | \$ 357,726.67 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007566221 | GEORGE | 770 MOUNTAIN STREAM WAY | GATLINBURG | \$ 599,299.96 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007566709 | | 870 VILLAGE LOOP RD | GATLINBURG | \$ 34,019.60 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007567311 | PAUL RANDALL AND JAN | 425 RED OAK HEIGHTS | GATLINBURG | \$ 192,957.61 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007568685 | | 332 Fuse Rd | gatlinburg | \$ 21,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007568949 | CURTIS | 1131 LONGVIEW CT | GATLINBURG | \$ 551,021.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569032 | DAVID R | 231 LOOP RD | GATLINBURG | \$ 153,274.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569068 | DAVID R | 214 ROARING FORK RD | GATLINBURG | \$ 153,274.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569109 | | 440 W LOOP RD | GATLINBURG | \$ 7,774.40 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569183 | CHRISTOPHER | 776 MOUNTAIN STREAM WAY | GATLINBURG | \$ 603,780.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569270 | PAUL | 1245 ANNES RD | GATLINBURG | \$ 17,187.83 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569345 | BUSINESS | 919 Sourwood Drive | gatlinburg | \$ 257,328.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007569840 | DONNA HUBBARD AND | 550 GREENBRIAR LN | GATLINBURG | \$ 320,484.08 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007570797 | JOANN FRANCES | 306 PINNACLE DR | GATLINBURG | \$ 261,238.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007571918 | MARK AND ALISA | LT129 CHESTNUT | GATLINBURG | \$ 182,627.40 |

EXHIBIT 2

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--|--------------|-------------------|-------------------------|--------------------|---------------|
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007572052 | | 440 W LOOP RD | GATLINBURG | \$ 997.63 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007572919 | THERESA | 610 MEDLIN DR | GATLINBURG | \$ 602,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007573093 | JOHN AND AMANDA | 1252 ANNES RD | GATLINBURG | \$ 277,588.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007574832 | BUSINESS | 1304 Garrett Drive | Gatlinburg | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007575826 | | 332 Fuse Rd | Gatlinburg | \$ 1,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007575946 | BUSINESS | 880 sourwood dr | Gatlinburg | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007576670 | BUSINESS | 330 RACCOON RIDGE RD | GATLINBURG | \$ 278,752.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007576734 | ANDREA | 407 WILEY OAKLEY DR | GATLINBURG | \$ 189,500.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007576970 | JODY | 730 DEERFOOT DR | GATLINBURG | \$ 288,290.43 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007576985 | TALMDGE PAUL | LT1244 ANNES R | GATLINBURG | \$ 246,219.90 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578048 | LUTHER | 335 PINNACLE DR | GATLINBURG | \$ 480,832.28 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578282 | JERRY | 334 PINNACLE DR | GATLINBURG | \$ 24,797.60 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578696 | SCOTT | 833 PARK DR | GATLINBURG | \$ 128,346.85 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578907 | RAYMOUND | 820 EAGLE COVE WAY | GATLINBURG | \$ 5,311.83 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578938 | RAYMOUND | 429 RED HAWK WAY | GATLINBURG | \$ 186,428.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007578972 | GARY | 713 TURKEY NEST RD | GATLINBURG | \$ 500,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007580660 | | 226 EAGLE RD | GATLINBURG | \$ 180,517.70 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007580693 | | 719 HAZY CIR | GATLINBURG | \$ 142,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007583071 | JOYCE | 225 WILLOW WAY | GATLINBURG | \$ 17,753.60 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007583124 | SHARON H | 1431 N ARBON LN | GATLINBURG | \$ 5,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007584261 | LEANNA | 706 KELLY ST | GATLINBURG | \$ 238,419.08 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007586648 | JAMES | 658 WILEY OAKLEY DR | GATLINBURG | \$ 237,349.06 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007586911 | VIVIAN | LT794 CHESTNUT DR | GATLINBURG | \$ 215,600.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007587154 | WILLIAM | 747 FOX HOLLOW RD | GATLINBURG | \$ 321,028.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007587310 | MATTHEW D | LT1248 ANNES R | GATLINBURG | \$ 23,388.41 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007587464 | JOY | 1062 DEEP HOLLOW RD | GATLINBURG | \$ 214,539.06 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007587500 | BUSINESS | 801 WILEY OAKLEY DR | GATLINBURG | \$ 398,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007588473 | BUSINESS | 916 W Cedar Lane | Gatlinburg | \$ 232,971.15 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007589524 | JOHNNY | 721 CHESTNUT DR | GATLINBURG | \$ 224,700.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007589529 | JOHNNY | 880 CHALET VILLAGE BLVD | GATLINBURG | \$ 389,554.80 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007590185 | EDWARD | 929 W CEDAR LN | GATLINBURG | \$ 250,609.60 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007590192 | RICHARD | 448 FORREST SPRINGS DR | GATLINBURG | \$ 319,955.69 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007590689 | BART | 1107 FOX RUN | GATLINBURG | \$ 16,068.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007590748 | STEPHENIE | 349 WILEY OAKLEY DR | GATLINBURG | \$ 275,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007591242 | JON | LT622 PINECREST | GATLINBURG | \$ 249,069.80 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007591339 | BUSINESS | 724 CHESTNUT DR | GATLINBURG | \$ 306,898.08 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007593559 | | 837 GREAT SMOKY WAY | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007593874 | JASON | 860 GREAT SMOKY WAY | GATLINBURG | \$ - |

EXHIBIT 2

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--|--------------|-------------------|-------------------------|--------------------|---------------|
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007594010 | DOROTHY | 1404 LAUREL RD | GATLINBURG | \$ 10,512.72 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007594066 | | 1705 BRENT HILLS BLVD | GATLINBURG | \$ 439.73 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007594714 | MICHAEL | 867 GREAT SMOKY WAY | GATLINBURG | \$ 3,364.94 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007595556 | RICHARD GALE | 518 CAMPBELL LEAD | GATLINBURG | \$ 619,602.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007598416 | KEVIN | 926 DAISY LN | GATLINBURG | \$ 429,224.86 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007600131 | THOMAS | 269 N MOUNTAIN TRL | GATLINBURG | \$ 378,218.65 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007600437 | JAMES | 730 HEIDEN DR | GATLINBURG | \$ 2,528.08 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007600982 | THOMAS L | 883 GREAT SMOKYWAY | GATLINBURG | \$ 28,769.27 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007601338 | SHERRY | 872 CHALET VILLAGE BLVD | GATLINBURG | \$ 445,559.84 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007601426 | WILLIAM | 750 CLIFF BRANCH RD | GATLINBURG | \$ 155,231.10 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007601429 | MARCIA J | 1004 ELM RD | GATLINBURG | \$ 344,414.36 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007605770 | RANDY | 1017 WILEY OAKLEY DR | GATLINBURG | \$ 389,019.66 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007605797 | JACK | 309 BRAUN WREN WAY | GATLINBURG | \$ 1,108.20 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007605999 | LINDA | LT951 VILLAGE LOOP RD | GATLINBURG | \$ 380,300.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007606172 | JON BRAD | 457 FOOTHILL DR | GATLINBURG | \$ 11,830.38 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007607656 | SARAH E | 432 W LOOP RD | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007608855 | GEORGE M | 629 BASKINS CREEK RD | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007608939 | GEORGE M | 623 BASKINS CREEK RD | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007609815 | BUSINESS | 918 tinker lane | gatlinburg | \$ 609,866.40 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007613146 | SYLVIA | 418 CADES COVE WAY | GATLINBURG | \$ 34,293.28 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007615681 | CAROL | 908 FARM WAGON RD | GATLINBURG | \$ 2,987.65 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007619064 | CHARLES | 750 KINGS WAY | GATLINBURG | \$ 11,900.82 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007620126 | MATTHEW | 350 WILD ORCHID WAY | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007620189 | THOMAS | 827 INNSBRUCK DR | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007622597 | DESIREE RENEE | 1154 VILLA OVERLOOK WAY | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007642532 | PAUL | 837 GREAT SMOKY WAY | GATLINBURG | \$ 4,564.27 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007644155 | DELJO | 714 PARK VISTA WAY | GATLINBURG | \$ 3,983.87 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007645949 | ERNEST | 512 HOOT OWL WAY | GATLINBURG | \$ 1,210.06 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007652088 | DARRELL | 832 GREAT SMOKY WAY | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007659049 | RALPH | 865 GREAT SMOKY WAY | GATLINBURG | \$ 5,050.11 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007659078 | RALPH | 820 RESORT WAY | GATLINBURG | \$ 35,885.98 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007738499 | NIMESH | 320/328 OWNBY STREET | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007746770 | BUSINESS | 915 WESTGATE RESORTS RD | GATLINBURG | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007762484 | MARIANNE | 408 LECONTE VIEW DR | GATLINBURG | \$ 488.64 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001779692 | DAVID | 122 W Ogle Dr | Gatlinburg | \$ 93,599.28 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001779721 | DAVID | 128 W Ogle Dr | Gatlinburg | \$ 93,599.28 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001786502 | ARA | 949 Crooked Ridge Rd | Gatlinburg | \$ 518,719.30 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001789012 | MYRA | 887 Great Smoky Way | Gatlinburg | \$ 320,523.80 |

EXHIBIT 2

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--|--------------|---------------------|----------------------------|--------------------|---------------|
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001789168 | MARILYN | 804 Davenport Rd | Gatlinburg | \$ 404,094.40 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001797987 | JAMES | 517 Wiley Oakley Dr | Gatlinburg | \$ 253,729.92 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001798155 | JAMES | 610 Loop Rd | Gatlinburg | \$ 144,718.83 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001798963 | LAUNA | 731 Horne Blowe Pike | Gatlinburg | \$ 167,324.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001799276 | EULA | 210 Rattlesnake Hollow Rd | Gatlinburg | \$ 75,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001803704 | BRETT | 230 Silverbell Ln | Gatlinburg | \$ 229,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001803865 | SCOTT HARRINGTON AN | 924 Aspen Ln | Gatlinburg | \$ 232,606.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001807445 | DAVID | 852 Village Loop Rd | Gatlinburg | \$ 280,260.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001808262 | RON | 235 Silverbell Ln | Gatlinburg | \$ 91,000.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001810585 | LYNDA | 309 Sterling Dr | Gatlinburg | \$ 209,200.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001811530 | GERALD | 744 Widows Knob Rd | Gatlinburg | \$ 737,150.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001813717 | JOSEPH | 912 Aspen Ln | Gatlinburg | \$ 187,564.12 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001813852 | GARRICK | 810 Village Loop Rd | Gatlinburg | \$ 383,720.48 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001814901 | TIMOTHY | 1009 Twin Oaks Rd | Gatlinburg | \$ 397,734.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001817284 | DEBBIE | 253 Cartertown Rd | Gatlinburg | \$ 1,355.61 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001819122 | SUSAN | 820 Crestwood Ln | Gatlinburg | \$ 930,865.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001820041 | KENNETH | 965 Cliff Branch Rd | Gatlinburg | \$ 224,584.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001827233 | J PAUL | 752 Village Loop Rd | Gatlinburg | \$ 447,160.74 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001976594 | ANDREA | 1016 Street Of Dreams | Gatlinburg | \$ 4,800.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007699126 | | 871 GREAT SMOKY WAY | GATLINBURG | \$ 1,750.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007588831 | | HIDDEN VALLEY CAMP GROUND | PIGEON FORGE | \$ 12,496.03 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007750295 | BUSINESS | 4539 FOREST VISTA WAY | PIGEON FORGE | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007562464 | | 3293 WEARS VALLEY RD | Sevierville | \$ - |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007568415 | BONNIE NUNLEY AND D | 1825 BLUE TICK WAY | SEVIERVILLE | \$ 246,147.11 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007635441 | RAYMOND | 704 OCTAGON DRIVE | SEVIERVILLE | \$ 437.50 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007576299 | DAVID | CHEATHAM | | \$ 375,722.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007581022 | NICKY | LT1118 EAST KINGS RIDGE RD | GATLINBURG | \$ 24,847.28 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007590423 | BRUCE | LT 1070 DEEP HOLLOW RD | GATLINBURG | \$ 253,737.80 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007594355 | SERITA | LT834 VILLAGE RD LOOP | GATLINBURG | \$ 332,230.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007598912 | DAWN | LT916 N WOODLAND DR | GATLINBURG | \$ 256,260.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007621846 | SHARON | 1320 BIG OAK CT | GATLINBURG | \$ 891.36 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 3007698597 | CLAY | LT930 SOURWOOD DR | GATLINBURG | \$ 142,037.00 |
| FOREMOST INSURANCE COMPANY GRAND RAPIDS, MICHIGAN | 5001805697 | MICHAEL | 813 Wattle Blossom Way | Gatlinburg | \$ 282,922.30 |
| FOREMOST PROPERTY AND CASUALTY INSURANCE COMPANY | 3007569206 | WILLIAM | 1531 GARRETT LN | GATLINBURG | \$ 6,811.27 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007576668 | BUSINESS | 745 PARKWAY STE 9 | GATLINBURG | \$ 42,646.51 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007579450 | BUSINESS | 1004 PARKWAY STE 421 | GATLINBURG | \$ 12,015.69 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007594126 | BUSINESS | 402 EAST PARKWAY | GATLINBURG | \$ 31,449.20 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007615032 | BUSINESS | 745 PARKWAY STE A | GATLINBURG | \$ 32,432.49 |

EXHIBIT 2


Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|--------------------------------------|--------------|-------------------|-----------------------------|--------------------|-----------------|
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007615092 | BUSINESS | 745 PARKWAY STE B | GATLINBURG | \$ 44,124.46 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007615111 | BUSINESS | 762 PARKWAY STE 1 | GATLINBURG | \$ 22,445.41 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007615189 | BUSINESS | 745 PARKWAY | GATLINBURG | \$ 28,186.77 |
| FOREMOST SIGNATURE INSURANCE COMPANY | 3007619959 | BUSINESS | 715 PARKWAY STE 1 | GATLINBURG | \$ 6,958.67 |
| Illinois Farmers Insurance Company | 3007590543 | | 634 Pine Crest Dr | Gatlinburg | \$ 10,868.00 |
| Mid-Century Insurance Company | 3007552054 | BUSINESS | 321 BROWN WREN WAY | GATLINBURG | \$ 2,168.35 |
| Mid-Century Insurance Company | 3007552755 | BUSINESS | 915 STATHAM WAY | GATLINBURG | \$ 17,419.95 |
| Mid-Century Insurance Company | 3007552878 | BUSINESS | 1433 GARRETT PL | GATLINBURG | \$ 17,737.47 |
| Mid-Century Insurance Company | 3007553415 | DEBRA | 563 WASHINGTON RD | GATLINBURG | \$ 385,142.00 |
| Mid-Century Insurance Company | 3007553543 | BUSINESS | 1683 ZURICH RD | GATLINBURG | \$ - |
| Mid-Century Insurance Company | 3007553711 | RICHARD | 611 DAVENPORT RD | GATLINBURG | \$ 965,525.00 |
| Mid-Century Insurance Company | 3007555955 | BUSINESS | 917 WOOD SMOKE WAY | GATLINBURG | \$ 26,537.94 |
| Mid-Century Insurance Company | 3007556449 | BUSINESS | 1140 VILLA OVERLOOK WAY | GATLINBURG | \$ 988,876.00 |
| Mid-Century Insurance Company | 3007556816 | JUDITH | 437 WEST LOOPE RD. | GATLINBURG | \$ 341,640.00 |
| Mid-Century Insurance Company | 3007557008 | BUSINESS | 367 WILEY OAKLEY DR | GATLINBURG | \$ 229,931.26 |
| Mid-Century Insurance Company | 3007557593 | BUSINESS | 1221 GARRETT DR | GATLINBURG | \$ - |
| Mid-Century Insurance Company | 3007557683 | BUSINESS | 628 CUB PATH WAY | GATLINBURG | \$ 1,501.02 |
| Mid-Century Insurance Company | 3007557871 | BUSINESS | 802 CRYSTAL BRANCH WAY | GATLINBURG | \$ 2,334.54 |
| Mid-Century Insurance Company | 3007558261 | BUSINESS | 249 GREYSTONE HEIGHTS RD | GATLINBURG | \$ 988,702.58 |
| Mid-Century Insurance Company | 3007558387 | BUSINESS | 657 GATLINBURG FALLS WAY | GATLINBURG | \$ 509,809.00 |
| Mid-Century Insurance Company | 3007558664 | BUSINESS | 921 STATHAM WAY | GATLINBURG | \$ 465,751.00 |
| Mid-Century Insurance Company | 3007558763 | BUSINESS | 922 STATHAM WAY | GATLINBURG | \$ 405,696.93 |
| Mid-Century Insurance Company | 3007558840 | BUSINESS | 927 STATHAM WAY | GATLINBURG | \$ 464,333.00 |
| Mid-Century Insurance Company | 3007558940 | BUSINESS | 646 PINECREST DRIVE | GATLINBURG | \$ 938,602.00 |
| Mid-Century Insurance Company | 3007559345 | BUSINESS | 849 GLADES ROAD STE185 | GATLINBURG | \$ - |
| Mid-Century Insurance Company | 3007560642 | BUSINESS | 714 MOUNTAIN STREAM WAY | GATLINBURG | \$ 622,773.00 |
| Mid-Century Insurance Company | 3007561288 | BUSINESS | 235 LAUREL OAKS WAY | GATLINBURG | \$ 597,300.00 |
| Mid-Century Insurance Company | 3007561468 | PHILLIP | 215 WOLISS LN UNIT 211 | GATLINBURG | \$ 2,781.61 |
| Mid-Century Insurance Company | 3007561517 | CLIFTON | 215 WOLISS LN UNIT 512 | GATLINBURG | \$ 2,603.03 |
| Mid-Century Insurance Company | 3007561641 | BUSINESS | 608 CORNERSTONE WAY | GATLINBURG | \$ 355,760.00 |
| Mid-Century Insurance Company | 3007562200 | BRENDA | 228 SHERMA CLABO RD | GATLINBURG | \$ 181,525.00 |
| Mid-Century Insurance Company | 3007562694 | BUSINESS | 818 GREAT SMOKEY WAY | GATLINBURG | \$ 10,060.05 |
| Mid-Century Insurance Company | 3007562940 | BUSINESS | 746 HAZY CIRCLE | GATLINBURG | \$ 247,650.00 |
| Mid-Century Insurance Company | 3007563306 | BUSINESS | 1318 BIG OAK CT | GATLINBURG | \$ 58,209.19 |
| Mid-Century Insurance Company | 3007564164 | BUSINESS | 755 MOUNTAIN TOP RD | GATLINBURG | \$ 1,173,489.00 |
| Mid-Century Insurance Company | 3007564421 | BUSINESS | 1544 ZURICH RD | GATLINBURG | \$ 8,638.61 |
| Mid-Century Insurance Company | 3007564590 | JOE | 215 WOLISS LN | GATLINBURG | \$ 2,289.85 |
| Mid-Century Insurance Company | 3007565085 | LARRY AND CYNTHIA | 321 COVE MOUNTAIN RD | GATLINBURG | \$ 799,840.00 |
| Mid-Century Insurance Company | 3007566619 | BUSINESS | 702 E PARKWAY | GATLINBURG | \$ 241,578.08 |
| Mid-Century Insurance Company | 3007568658 | BUSINESS | 439 CHEROKEE ORCHARD RD | GATLINBURG | \$ 395,778.69 |
| Mid-Century Insurance Company | 3007568674 | BUSINESS | 437 CHEROKEE ORCHARD RD | GATLINBURG | \$ 283,503.24 |
| Mid-Century Insurance Company | 3007568675 | BUSINESS | 509 CHEROKEE ORCHARD RD | GATLINBURG | \$ 520,709.46 |
| Mid-Century Insurance Company | 3007568681 | | 540 Loop Rd | Gatlinburg | \$ 52,898.64 |
| Mid-Century Insurance Company | 3007568804 | BUSINESS | 931 SOURWOOD DR | GATLINBURG | \$ 249,812.05 |
| Mid-Century Insurance Company | 3007569434 | BUSINESS | 788 MOUNTAIN TOP RD | GATLINBURG | \$ 522,390.44 |
| Mid-Century Insurance Company | 3007571471 | BUSINESS | 944 VILLAGE LOOP RD | GATLINBURG | \$ 1,099,797.00 |
| Mid-Century Insurance Company | 3007571686 | BUSINESS | 1276 BEAR CUB WAY | GATLINBURG | \$ 2,052.15 |
| Mid-Century Insurance Company | 3007573672 | WARD | 1008 E FOOTHILLS DR | GATLINBURG | \$ 4,735.55 |
| Mid-Century Insurance Company | 3007575703 | VALERIE | LT1030 LITTLE SMK R 5B | GATLINBURG | \$ 226,991.91 |
| Mid-Century Insurance Company | 3007576134 | BUSINESS | 240 STONE FENCE LN | GATLINBURG | \$ 1,064,084.00 |
| Mid-Century Insurance Company | 3007577246 | BUSINESS | 746 MOUNTAIN STREAM WAY | GATLINBURG | \$ 910,200.00 |
| Mid-Century Insurance Company | 3007577414 | BUSINESS | 764 MOUNTAIN TOP RD | GATLINBURG | \$ 107,436.32 |
| Mid-Century Insurance Company | 3007577429 | BUSINESS | 766 MOUNTAIN STREAM WAY | GATLINBURG | \$ 864,600.00 |
| Mid-Century Insurance Company | 3007577516 | BUSINESS | 830 GREAT SMOKEY WAY | GATLINBURG | \$ 58,428.63 |
| Mid-Century Insurance Company | 3007577606 | BUSINESS | 244 STONE FENCE LN | GATLINBURG | \$ 675,673.00 |
| Mid-Century Insurance Company | 3007579036 | BUSINESS | 862 GREAT SMOKEY WAY | GATLINBURG | \$ 9,744.48 |
| Mid-Century Insurance Company | 3007580484 | | 336 TOWER RD | GATLINBURG | \$ 436,813.09 |
| Mid-Century Insurance Company | 3007581034 | BUSINESS | 143 RATTLESNAKE HOLLOW RD | GATLINBURG | \$ 12,918.48 |
| Mid-Century Insurance Company | 3007585753 | | 563 Washington Rd | Gatlinburg | \$ - |
| Mid-Century Insurance Company | 3007586043 | BUSINESS | 725 MOUNTAIN STREAM WAY | GATLINBURG | \$ 26,346.54 |
| Mid-Century Insurance Company | 3007586046 | BUSINESS | 816 RESORT WAY | GATLINBURG | \$ 27,550.26 |
| Mid-Century Insurance Company | 3007586222 | BUSINESS | 510 FOOTHILL DR | GATLINBURG | \$ 375,900.00 |
| Mid-Century Insurance Company | 3007589189 | BUSINESS | 960 COTTAGE GARDENS WAY | GATLINBURG | \$ 401,697.24 |
| Mid-Century Insurance Company | 3007589262 | BUSINESS | 344 HILLTOP RD | GATLINBURG | \$ 6,519.51 |
| Mid-Century Insurance Company | 3007590291 | BUFORD | 215 WOLISS LN UNIT 309 | GATLINBURG | \$ 3,034.82 |
| Mid-Century Insurance Company | 3007593529 | BUSINESS | 211 PKWY | GATLINBURG | \$ 11,851.64 |
| Mid-Century Insurance Company | 3007593626 | WILBUR | 215 WOLISS LN UNIT 206 | GATLINBURG | \$ 3,820.35 |
| Mid-Century Insurance Company | 3007593642 | MARY | 102 BASKINS CREEK BYP # 109 | GATLINBURG | \$ 1,356.43 |
| Mid-Century Insurance Company | 3007593644 | WILBUR | 215 WOLISS LN UNIT 408 | GATLINBURG | \$ 3,433.09 |
| Mid-Century Insurance Company | 3007593768 | WILBUR | 215 WOLISS LN UNIT 208 | GATLINBURG | \$ 3,300.44 |
| Mid-Century Insurance Company | 3007593785 | WILBUR | 215 WOLISS LN UNIT 311 | GATLINBURG | \$ 4,336.05 |

EXHIBIT 2

Farmers List of Claims
Chimney Tops II Fire Tennessee

| Carrier | Claim Number | Insured Last Name | Loss Location Street | Loss Location City | Total Claim |
|-------------------------------|--------------|-------------------|---------------------------|--------------------|------------------|
| Mid-Century Insurance Company | 3007594362 | RONALD | 215 WOLISS LN UNIT 101 | GATLINBURG | \$ 7,200.00 |
| Mid-Century Insurance Company | 3007595166 | BUSINESS | 356 WILD ORCHID WAY | GATLINBURG | \$ 1,963.66 |
| Mid-Century Insurance Company | 3007595193 | BUSINESS | 528 HOOT OWL WAY | GATLINBURG | \$ 2,694.01 |
| Mid-Century Insurance Company | 3007595194 | BUSINESS | 1759 MOUNTAIN SHADOWS WAY | GATLINBURG | \$ 2,704.17 |
| Mid-Century Insurance Company | 3007595237 | BUSINESS | 407 MONTVIEW | GATLINBURG | \$ 398.53 |
| Mid-Century Insurance Company | 3007599398 | BUSINESS | 917 TINKER LN | GATLINBURG | \$ 53,677.31 |
| Mid-Century Insurance Company | 3007601508 | DAVID | 215 WOLISS LN UNIT 313 | GATLINBURG | \$ 1,216.52 |
| Mid-Century Insurance Company | 3007605649 | BUSINESS | 427 MONTVIEW WAY | GATLINBURG | \$ 788.80 |
| Mid-Century Insurance Company | 3007605778 | BUSINESS | 503 HOOT OWL WAY | GATLINBURG | \$ 1,027.48 |
| Mid-Century Insurance Company | 3007605788 | BUSINESS | 315 BROWN WREN WAY | GATLINBURG | \$ 1,431.08 |
| Mid-Century Insurance Company | 3007606115 | BUSINESS | 204 W. PINNACLE DR. | GATLINBURG | \$ 24,888.16 |
| Mid-Century Insurance Company | 3007608740 | BUSINESS | 915 WESTGATE RD | GATLINBURG | \$ 100.13 |
| Mid-Century Insurance Company | 3007608884 | BUSINESS | 928 HIGH MOUNTAIN WAY | GATLINBURG | \$ 2,662.77 |
| Mid-Century Insurance Company | 3007608967 | BUSINESS | 916 HIGH MOUNTAIN WAY | GATLINBURG | \$ 2,935.00 |
| Mid-Century Insurance Company | 3007609566 | BUSINESS | 372 WILD ORCHID WAY | GATLINBURG | \$ - |
| Mid-Century Insurance Company | 3007635584 | BUSINESS | 844 CHESTNUT DR | GATLINBURG | \$ 342,000.00 |
| Mid-Century Insurance Company | 3007722443 | KENNETH | 356 SMOKY VIEW RD | GATLINBURG | \$ 12,000.00 |
| Mid-Century Insurance Company | 3007727023 | PATRICK | 742 WINDSWEEP ROAD | GATLINBURG | \$ 7,388.08 |
| Mid-Century Insurance Company | 5001788050 | | 849 Glades Rd | Gatlinburg | \$ - |
| Mid-Century Insurance Company | 5001788907 | ROBERT | 540 Loop Rd | Gatlinburg | \$ 461,459.99 |
| Mid-Century Insurance Company | 3007577531 | BUSINESS | 902 PARK VIEW WAY | GATLINBURG | \$ 58,260.76 |
| Mid-Century Insurance Company | 3007598190 | BUSINESS | 1211 BIG OAK COURT | GATLINBURG | \$ 314,460.00 |
| Truck Insurance Exchange | 3007554244 | BUSINESS | 321 TOWER ROAD | GATLINBURG | \$ 349,320.85 |
| Truck Insurance Exchange | 3007555167 | BUSINESS | 425 WILEY OAKLEY DR | GATLINBURG | \$ 475,400.00 |
| Truck Insurance Exchange | 3007555266 | AMY | 828 CREST VIEW DR | GATLINBURG | \$ 346,618.00 |
| Truck Insurance Exchange | 3007562319 | BUSINESS | 509 WOODLAND DR | GATLINBURG | \$ 501,200.01 |
| Truck Insurance Exchange | 3007569149 | CHRISTOPHER | 411 RED OAK HTS | GATLINBURG | \$ 49,654.23 |
| Truck Insurance Exchange | 3007573241 | BUSINESS | 611 WILEY OAKLY DR | GATLINBURG | \$ 1,787,652.00 |
| Truck Insurance Exchange | 3007594513 | BUSINESS | 402 LAUREL AVENUE | GATLINBURG | \$ 13,467.76 |
| Truck Insurance Exchange | 3007571563 | BUSINESS | 443 JUDY TOP LN | PIGEON FORGE | \$ 20,329.55 |
| Truck Insurance Exchange | 3007581076 | BUSINESS | 4367 FOREST RIDGE WAY | PIGEON FORGE | \$ - |
| Truck Insurance Exchange | 3007561825 | BUSINESS | 445 JUDY TOP LN | SEVIERVILLE | \$ 31,360.79 |
| Truck Insurance Exchange | 3007569552 | BUSINESS | 703 JESS FIELD RD | SEVIERVILLE | \$ 393,294.00 |
| Truck Insurance Exchange | 3007569735 | BUSINESS | 815 KINGS WAY | SEVIERVILLE | \$ 387,247.00 |
| | | | | | \$ 72,121,452.84 |

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|--|--|--|--|--|--|
| CLAIM FOR DAMAGE, INJURY, OR DEATH | | INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions. | | FORM APPROVED OMB NO. 1105-0008 | |
| 1. Submit to Appropriate Federal Agency: United States Department of the Interior National Park Service 1849 C. Street, N.W. Washington DC 20240 | | | 2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. Nautilus Insurance Group c/o Berger Kahn, Craig S. Simon 1 Park Plaza, Ste. 340, Irvine, CA 92614 | | |
| 3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN | | 4. DATE OF BIRTH | 5. MARITAL STATUS | 6. DATE AND DAY OF ACCIDENT 11/23-29/2016 | |
| 7. TIME (A.M. OR P.M.) | | | | | |
| 8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). Claimants' damages are the direct and proximate result of the negligent acts or omissions by the U.S. Dept of the Interior and the National Park Service in connection with the Chimney Tops II Fire that started on November 23, 2016 in the Great Smoky Mountains National Park (GSMNP). [Continued in Attachment B, next page] | | | | | |
| 9. PROPERTY DAMAGE | | | | | |
| NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). See "C" attached list of claims paid to Claimant's insureds as a result of damage to real and personal property, and evacuation. BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side). See attached list of claims and addresses attached as "C". | | | | | |
| 10. PERSONAL INJURY/WRONGFUL DEATH | | | | | |
| STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. Claims include damage caused by evacuation, fire and smoke the property of Claimant's insureds, including damage to real and personal property, added living expenses, business property, and loss of income (including business and residential rental income). | | | | | |
| 11. WITNESSES | | | | | |
| NAME | | ADDRESS (Number, Street, City, State, and Zip Code) | | | |
| Greg Salansky, Fire Mgmt. Officer Greg Miller (Chief Miller) | | Employee, Dept. of Interior, National Park Service (address unknown) Gatlinburn Fire Department Chief (address unknown) | | | |
| 12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars) | | | | | |
| 12a. PROPERTY DAMAGE 1,008,505 | | 12b. PERSONAL INJURY | | 12c. WRONGFUL DEATH | |
| | | | | 12d. TOTAL (Failure to specify may cause forfeiture of your rights). 1,008,505 | |
| I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM. | | | | | |
| 13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).  | | | 13b. PHONE NUMBER OF PERSON SIGNING FORM 949-474-1880 | | 14. DATE OF SIGNATURE 11/19/2018 |
| CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729). | | | CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.) | | |

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STANDARD FORM 95 (REV. 2/2007)
PRESCRIBED BY DEPT. OF JUSTICE
28 CFR 14.2

EXHIBIT 2

| INSURANCE COVERAGE | |
|--|----------------------------------|
| In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property. | |
| 15. Do you carry accident insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. <input checked="" type="checkbox"/> No | |
| Claimant is an insurance carrier seeking recovery in subrogation for damages paid to its insureds. | |
| 16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? <input type="checkbox"/> Yes <input type="checkbox"/> No | 17. If deductible, state amount. |
| 18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts). | |
| 19. Do you carry public liability and property damage insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). <input type="checkbox"/> No | |
| INSTRUCTIONS | |
| <p>Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.</p> <p style="text-align: center;">Complete all items - Insert the word NONE where applicable.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY</p> <p>Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.</p> <p>If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.</p> <p>The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.</p> <p>If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.</p> </div> <div style="width: 48%;"> <p>DAMAGES IN A <u>SUM CERTAIN</u> FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN <u>TWO YEARS</u> AFTER THE CLAIM ACCRUES.</p> <p>The amount claimed should be substantiated by competent evidence as follows:</p> <p>(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.</p> <p>(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.</p> <p>(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.</p> <p>(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.</p> </div> </div> | |
| PRIVACY ACT NOTICE | |
| <p>This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(a)(3), and concerns the information requested in the letter to which this Notice is attached.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>A. <i>Authority:</i> The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.</p> </div> <div style="width: 48%;"> <p>B. <i>Principal Purpose:</i> The information requested is to be used in evaluating claims.</p> <p>C. <i>Routine Use:</i> See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.</p> <p>D. <i>Effect of Failure to Respond:</i> Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."</p> </div> </div> | |
| PAPERWORK REDUCTION ACT NOTICE | |
| <p>This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.</p> | |

STANDARD FORM 95 REV. (2/2007) BACK

EXHIBIT 2

ATTACHMENT "A" TO FORM 95 CLAIM FORM:

Continued response to Question 2: Name and Address of Claimant:

List of Nautilus Group insurance carriers include, but are not limited to:

NAUTILUS INSURANCE COMPANY
NAUTILUS INSURANCE GROUP

ATTACHMENT "B" TO FORM 95 CLAIM FORM:

Continued response to Question 8: Basis of Claim:

Claimants allege that USA, the Department of the Interior and the National Park Service, by and through its employees and agents, failed to monitor the fire, and failed to initiate any direct-attack to suppress the fire despite predicted high winds. When high winds arose as predicted on 11/28/16, the fire escaped the Park and rapidly grew in size and strength, causing extensive damage to Claimants' insureds in nearby cities. Plaintiffs seek remedies for substantial property damages suffered by insureds and paid by Claimants under policies of insurance resulting from the negligent acts and/or omissions of employees or agents of the National Park Service and/or Department of the Interior – while acting within the course and scope of their employment or agency – in direct violation of mandated requirements and/or policies and in wanton neglect and disregard of public safety, including:

- the failure to monitor The Chimney Tops 2 Fire in the Great Smokey Mountain National Park;
- failure to adhere to mandatory command-structure requirements;
- failure to adhere to mandatory fire management policies and requirements;
- neglecting to perform requisite complexity analyses;
- negligently implementing a 410-acre containment box;
- negligently failing to adopt contingency plans in case The Chimney Tops 2 Fire escaped the containment box or the GSMNP;
- negligently disregarding fire-behavior modeling;
- negligently failing to utilize available air operations to suppress The Chimney Tops 2 Fire;
- negligently failing to implement a universal communications system to permit inter-agency communications, thus preventing many responders from effectively communicating with one another;
- negligently failing to utilize the Wildland Fire Decision Support System ("WFDSS"), which would have prompted (1) periodic assessments of the ongoing effectiveness and (2) re-evaluation of suppression-strategies; and

- negligently failing to provide timely and accurate notice and warning to Park neighbors, local government officials, local fire departments, local residents and visitors about the status of and imminent danger presented by The Chimney Top 2 Fire.

ATTACHMENT "C" TO FORM 95 CLAIM FORM:

Continued response to Question 10: List of Claims

See attached List of Claims.

Nautilus Insurance List of Claims
Chimney Tops II Fire

| Carrier | Claim No | Address of Loss | City | State | Zip | Paid Indemnity |
|--------------------------|----------|------------------------|------------|-------|-------|-----------------|
| Nautilus Insurance Group | 10087872 | 15-517 Parkway | Gatlinburg | TN | 37738 | \$ 32,505.48 |
| Nautilus Insurance Group | 10087777 | 335 El Holly Ridge Rd. | Gatlinburg | TN | 37738 | \$ 976,000.00 |
| Total | | | | | | \$ 1,008,505.48 |

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PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am employed by Berger Kahn, A Law Corporation, whose business address is: 1 Park Plaza, Suite 340, Irvine, California 92614 ("the firm").

On November 20, 2018, I served the within document(s) described as:
NAUTILUS INSURANCE GROUP, ETC. CLAIM FOR DAMAGE, INJURY OF DEATH STANDARD FROM 95 on the interested parties in this action by placing the original and true copies thereof enclosed in sealed envelope(s) addressed as follows:

United States Department of the Interior, National Parks Service
1849 C Street NW
Washington, DC 20240

☒ **BY OVERNIGHT MAIL** (C.C.P. § 1013(c))—I placed said envelope(s) for collection by *****FEDERAL EXPRESS*****, following ordinary business practices, at the business offices of Berger Kahn for collection and processing of correspondence with said overnight mail service, and said envelope(s) will be deposited with said overnight mail service on said date in the ordinary course of business.

I am "readily familiar" with the firm's practice of collection and processing of correspondence for service with said overnight mail service. It is deposited with said overnight mail service on that same day in the ordinary course of business. I am aware that, on motion of a party served, service is presumed invalid if the said overnight delivery service cancellation date or delivery date on the overnight delivery service slip is more than one day after the date of deposit with said overnight delivery service contained in this affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 20, 2018, at Irvine, California.


ATHENA KETCHER